

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CONNECTIONS COMMUNITY SUPPORT  
PROGRAMS, INC.,

Debtor.<sup>1</sup>

Chapter 7

Case No. 21-10723 (MFW)

**NOTICE OF FILING OF SCHEDULE OF UNPAID DEBTS**

PLEASE TAKE NOTICE that on September 27, 2021, the United States Bankruptcy Court for the District of Delaware entered the *Order Granting Motion to Convert Debtor's Chapter 11 Case to a Case Under Chapter 7 of the Bankruptcy Code* [Docket No. 537] (the “**Conversion Order**”) whereby the chapter 11 case of the debtor (the “**Debtor**”) was converted to a case under chapter 7 of title 11 of the United States Code, effective as of September 27, 2021.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Conversion Order, and in accordance with Rule 1019(5)(A)(ii) of the Federal Rules of Bankruptcy Procedure, the Debtor hereby submits its schedule of unpaid debts incurred from the petition date of April 19, 2021, through the conversion date of September 27, 2021, which is attached hereto as **Exhibit A** (the “**Schedule**”). The attached Schedule includes filed administrative expense claims, including claims filed under section 503(b)(9) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”).

PLEASE TAKE FURTHER NOTICE that nothing included in the Schedule is intended or shall be deemed to (i) constitute an admission as to the validity of any debt or (ii) impair,

---

<sup>1</sup> The Debtor in this chapter 11 case, along with the last four digits of its tax identification number, is as follows: Connections Community Support Programs, Inc. (3030). The address of the Debtor's corporate headquarters is 3812 Lancaster Pike, Wilmington, Delaware 19805.

prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtor and its estate with respect to the debts listed therein. Among other things, the Debtor has not reviewed the majority of the filed alleged claims asserting an administrative expense priority under the Bankruptcy Code and it is expected that the final allowed amount of any such claims will be substantially less than the filed amount of such claims.

Dated: October 11, 2021  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark L. Desgrosseilliers

William E. Chipman, Jr. (No. 3818)  
Mark L. Desgrosseilliers (No. 4083)  
Hercules Plaza  
1313 North Market Street, Suite 5400  
Wilmington, Delaware 19801  
Telephone: (302) 295-0191  
Facsimile: (302) 295-0199  
Email: [chipman@chipmanbrown.com](mailto:chipman@chipmanbrown.com)  
[desgross@chipmanbrown.com](mailto:desgross@chipmanbrown.com)

*Counsel to the Debtor and Debtor-In-Possession*

Connections CSP  
Working Draft Document  
Projected Wind Down Expenses Under Chapter 7 Conversion through 09/27  
Preliminary Draft - For Discussion Purposes Only - Subject to Revision  
See Notes below

		(A)	(B)	(C)	(D)	(E)	(F)	(A) + (D)	(B) + (E)	(C) + (F)
		Professionals	Other	Total	Professionals	Other	Total	Total Professionals	Total Other	Grand Total
		<u>Thru August 31, 2021</u>	<u>Thru August 31, 2021</u>	<u>Thru August 31, 2021</u>	<u>September thru 9/27/21</u>	<u>September thru 9/27/21</u>	<u>September thru 9/27/21</u>	<u>Open</u>	<u>Open</u>	<u>Open</u>
Chipman Brown Cicero & Cole										
Hercules Plaza	July - Hold Back	29,041		29,041						
1313 N. Market Street, Suite 5400	August	99,569		99,569						
Wilmington, DE 19801	September			-	52,407					
Total CBCC		<u>128,610</u>		<u>128,610</u>	<u>52,407</u>					
EisnerAmper LLP	Hold Back	64,314		64,314						
1 Logan Square 130 North 18th Street	August	119,087		119,087						
Philadelphia Pa 19103	September			-	86,646					
Total EA		<u>183,401</u>		<u>183,401</u>	<u>86,646</u>					
Omni Solutions	Thru July	50,379		50,379						
5955 DeSoto Avenue, Suite 100	August	37,124		37,124						
Woodland Hills, CA 91367	September				51,878					
Total Omni		<u>87,503</u>		<u>87,503</u>	<u>51,878</u>					
Polsinelli	July	50,861		50,861						
222 Delaware Avenue, Suite 1101	August	54,287		54,287						
Wilmington, DE 19801	Sept	-			26,407					
		<u>105,148</u>		<u>105,148</u>	<u>26,407</u>					
Patient Care Ombudsperson		<u>16,654</u>		<u>16,654</u>						
Huebscher & Co.										
630 3 <sup>rd</sup> Avenue – 21 <sup>st</sup> Floor										
New York, NY 10017										
Leech Tishman (Counsel to PCO)		<u>16,917</u>		<u>16,917</u>						
1007 North Orange Street, 4th Floor										
Wilmington, DE 19801										

#### Notes

The analysis consists of preliminary estimates that are subject to updates. Professional fees are subject to Court approval.

See attached list. The list attached includes administrative claims and 503 (B) 9 claims totalling in excess of \$70 million as submitted. The claims on such attached list have not all been reviewed and analyzed by the Debtor. The Debtor believes that such amounts will be substantially reduced after such ongoing review

(A) is complete.

Connections CSP  
Working Draft Document  
Projected Wind Down Expenses Under Chapter 7 Conversion through 09/27  
Preliminary Draft - For Discussion Purposes Only - Subject to Revision  
See Notes below

	(A)	(B)	(C)	(D)	(E)	(F)	(A) + (D)	(B) + (E)	(C) + (F)
	Professionals	Other	Total	Professionals	Other	Total	Total Professionals	Total Other	Grand Total
	<u>Thru August 31, 2021</u>	<u>Thru August 31, 2021</u>	<u>Thru August 31, 2021</u>	<u>September thru 9/27/21</u>	<u>September thru 9/27/21</u>	<u>September thru 9/27/21</u>	<u>Open</u>	<u>Open</u>	<u>Open</u>
Bayshore Ford C/O Young Conway Stargatt & Taylor 1000 N. King Street, Wilmington DE, 19801		40,063	40,063						
Headcount Inc - Collection Personnel Headcount Management Inc. PO Box 202056 Dallas, Texas 75320-2056	14-Aug 21-Aug 28-Aug 4-Sep	6,548 7,613 7,904							
		22,065	22,065		7,921 7,921	-			
HighMark Health Options C/O Luke Sizemore, Reed Smith LLP 225 Fifth Avenue, Pittsburgh, PA 15222 Amount that Conexio Paid Net Due		651,675							
		(334,267)							
		317,408	317,408						
Weiner Benefits Group (WBG) 2961 Centerville Road, Suite 300 Wilmington, DE 19808		16,312	16,312						
503 B 9 Claims - Received some late in the process and not fully analyzed		-	(A)						
Administrative Claims - Received Late in the Process and not yet fully analyzed		-	(A)						
US Trustees Fees Estimated 2nd Qtr thru 9/27/21		70,000	70,000		10,000				
Subtotal taking into account Note A	538,232	465,848	1,004,080	217,338	17,921	235,259	755,570	483,769	1,239,339
			1,004,080						

#### Notes

The analysis consists of preliminary estimates that are subject to updates. Professional fees are subject to Court approval.

See attached list. The list attached includes administrative claims and 503 (B) 9 claims totalling in excess of \$70 million as submitted. The claims on such attached list have not all been reviewed and analyzed by the Debtor. The Debtor believes that such amounts will be substantially reduced after such ongoing review (A) is complete.

**CONNECTIONS COMMUNITY SUPPORT PROGRAMS, INC.****CASE NO. 21-10723 (MFW)****503(b)(9) & ADMIN EXPENSE CLAIMS**

<b>Claim No.</b>	<b>Claimant</b>	<b>CLAIM CLASSIFICATION</b>	<b>Amount<sup>1</sup></b>
2	Gordon Food Service, Inc.	503(b)(9)	\$10,773.41
4	Staples Business Advantage	503(b)(9)	\$4,898.44
5	Gordon Food Service, Inc.	503(b)(9)	\$10,773.41
22	Medline Industries Inc.	503(b)(9)	\$13,147.83
44	Wayman Fire Protection	503(b)(9)	\$456.00
47	Harbor Textile Rental Services, Inc. (New Castle, DE)	503(b)(9)	\$2,191.31
48	Sanitary Linen Service, Inc.	503(b)(9)	\$2,076.74
52	Gordon Food Service, Inc.	503(b)(9)	\$10,773.41
52	Gordon Food Service, Inc.	Admin Expense	\$20,734.34
80	Patient 80	Admin Expense	\$3,200,000.00
84	Eric M. Krise Electrical Contractor LLC	Admin Expense	\$360.06
85	Patient 85	Admin Expense	\$3,800.00
87	Rite Air Mechanical	503(b)(9)	\$2,355.65
88	Bob Cat Septic	Admin Expense	\$4,440.00
90	Rite Air Mechanical	Admin Expense	\$2,355.65
93	Wes Ventures Inc. dba Glass Doctor Delaware	Admin Expense	\$1,115.00
96	Patient 96	Admin Expense	\$100,000.00
98	Blue Hen Naamans Rd	503(b)(9)	\$462.00
99	Blue Hen Car Wash	Admin Expense	\$462.00
105	Frank V. Dignan	503(b)(9)	\$50,000.00
106	Patient 106	Admin Expense	\$50,000.00
108	Emergency Response Protocol	Admin Expense	\$0.00
114	Patient 114	Admin Expense	\$2,500,000.00
119	Rockfield Collision LLC	Admin Expense	\$15,041.88
121	Patient 121	Admin Expense	\$0.00
123	Patient 123	Admin Expense	\$0.00
128	Bayshore Records Management	503(b)(9)	\$0.00

<sup>1</sup> The Amounts set forth herein are the filed amounts of the claims. The claims remain subject to ongoing review by the Debtor and are subject to all of the Debtor's rights and defenses. The Debtor believes that the amount of the claims set forth herein will be substantially reduced after such review.

**CONNECTIONS COMMUNITY SUPPORT PROGRAMS, INC.****CASE NO. 21-10723 (MFW)****503(b)(9) & ADMIN EXPENSE CLAIMS**

130	Bayshore Ford Truck Sales, Inc.	503(b)(9)	\$8,355.98
131	Bayshore Ford Truck Sales, Inc.	Admin Expense	\$80,062.96
138	Seaford Endoscopy Center LLC	Admin Expense	\$0.00
141	Patient 141	Admin Expense	\$260,000.00
142	Patient 142	Admin Expense	\$50,000,000.00
147	Patient 147	Admin Expense	\$1,000,000.00
148	Phillip Maloney	503(b)(9)	\$0.00
150	Old Town Hall Associates, Inc.	Admin Expense	\$11,128.84
160	Patient 160	Admin Expense	\$28,000.00
163	Joseph W Bowsbey	Admin Expense	\$0.00
165	Patient 165	Admin Expense	\$0.00
174	B&B Design Contracting LLC	503(b)(9)	\$2,450.00
177	Balboa Capital Corporation	Admin Expense	\$38,903.18
178	Balboa Capital Corporation	Admin Expense	\$30,480.00
179	Care4 Software, Inc.	Admin Expense	\$4,733.33
181	Drummond Plaza Associates, LLC	Admin Expense	\$20,913.98
182	B&B Design Contracting Inc.	Admin Expense	\$2,450.00
183	White and Williams LLP	Admin Expense	\$55,144.85
184	Highmark BDBSD Inc.	Admin Expense	\$651,675.00
186	Selective Insurance Company of the Southeast	Admin Expense	\$11,793.00
187	AmeriHealth Caritas Delaware, Inc.	Admin Expense	\$150,000.00
203	C&S Computer Consulting, Inc.	503(b)(9)	\$0.00
209	Teeo Thomas Morton	Admin Expense	\$600.00
248	Meyer & Meyer Realty	Admin Expense	\$8,200.00
251	Meyer & Meyer Realty	Admin Expense	\$5,187.00
253	Meyer & Meyer Realty	Admin Expense	\$7,384.00
254	Patient 254	Admin Expense	\$141,025.00
276	Patient 276	Admin Expense	\$149.92
284	Atlantic Retina Center, PA	503(b)(9)	\$2,115.00
285	Atlantic Retina Center, PA	503(b)(9)	\$2,115.00
286	Atlantic Retina Center, PA	503(b)(9)	\$155.00
287	Atlantic Retina Center, PA	503(b)(9)	\$965.00
288	Atlantic Retina Center, PA	503(b)(9)	\$180.00

**CONNECTIONS COMMUNITY SUPPORT PROGRAMS, INC.****CASE NO. 21-10723 (MFW)****503(b)(9) & ADMIN EXPENSE CLAIMS**

290	Atlantic Retina Center, PA	503(b)(9)	\$1,005.00
292	Atlantic Retina Center, PA	503(b)(9)	\$995.00
296	Atlantic Retina Center, PA	503(b)(9)	\$155.00
299	Patient 299	Admin Expense	\$400,000.00
300	Patient 300	Admin Expense	\$400,000.00
302	Patient 302	Admin Expense	\$0.00
304	Atlantic Retina Center, PA	503(b)(9)	\$995.00
305	Atlantic Retina Center, PA	503(b)(9)	\$155.00
309	Meyer & Meyer Realty	Admin Expense	\$8,200.00
317	Patient 317	Admin Expense	\$400,000.00
318	Meyer & Meyer Realty	Admin Expense	\$5,187.00
319	Meyer & Meyer Realty	Admin Expense	\$7,384.00
320	Patient 320	Admin Expense	\$3,000.00
321	Patient 321	Admin Expense	\$141,025.00
324	Patient 324	Admin Expense	\$15,000,000.00
327	Patient 327	Admin Expense	\$0.00
328	Precious Purnell	Admin Expense	\$0.00
330	Patient 330	Admin Expense	\$3,000.00
333	Wayman Fire Protection	Admin Expense	\$841.00
335	Patient 335	Admin Expense	\$149.92
	<b>Total</b>		<b>\$74,902,476.09</b>